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January 23, 2023

AUSA Jonathan Lax  
AUSA John Enright  
United States Attorney's Office  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Nerayoff, Cr. 20-0008 (MKB)

Dear Jon and John,

Consistent with Rule 16 and in conjunction with Marc Agnifilo's July 18, 2022 document request we now request the following:

- 1) The substance of any oral statements made by Mr. Nerayoff to any employee of the Federal Government or its agent (including but not limited to FBI, DOJ, SEC, FINRA).
- 2) Any written or recorded statements made by Mr. Nerayoff in the government's possession (including but not limited to 302 reports, notes of interviews in connection with those reports).
- 3) To inspect and to copy, photograph, etc. any of Mr. Nerayoff's papers, documents, data, photographs, tangible objects, in the government's possession, custody, or control obtained from Mr. Nerayoff or previously under his control—including but not limited to the digital information the Government received from Apple Inc. that resided on Mr. Nerayoff's Apple i-cloud backup. We would also request an inventory of these items.

Sincerely,

*Michael A. Scotto*